U.S. EPA – Region 8 – MT Office Event Plan

Activity	R8 Doug Benevento, Region 8 Administrator visit with Butte Community Members Silver Bow Creek/Butte Area Superfund Site (SBCBA) in Coordination with Restore our Creek Coalition (ROCC)	
Date	Wed. Nov. 1, 2017 @ 1:30 – 2:30	
Venue	Butte Chamber of Commerce Visitor's Center @ 1000 George St., Butte MT	
EPA Team	RA, DRA – Suzanne Bowen, Joe Vranka, MT Superfund Sup., Robert Moler, CIC	
invites	Northey	Main POC, ROCC spokesperson, former mining engineer 406-498-3274
	Tretheway	ROCC outreach coordinator, USFS Recreational Forester
	Jocelyn Dodge	ROCC member and Local church and community leader,
	Sister Mary Joe	ROCC member and former MT Governor staff
	Evan Barrett,	ROCC member
	Joel Shoemaker	ROCC member
	Ed Simonich	ROCC member
	Larry Curran	ROCC member, member of Citizens for Labor and Env. Justice (CLEJ), EPA EJ grant applicant
	Mary Cay Craig	ROCC member and community leader and former MT DEQ project manager for SBCBA
	Joe Griffin	ROCC member
	Don Peoples	CTEC President, BLM Geologist (CTEC is recipient of EPA Technical Assistance Grant)
	Dave Williams	CTEC Vice President, Former MT Tech college professor
	Bill McGregor	WET project leader in SBCBA
	Elizabeth Ericksen	Longtime community Superfund activist/critic, former MT legislator
	Fritz Daily	CTEC & CLEJ Board member, UM Tech Professor, Superfund activist/critic
	Dr. John Ray	City and County of Butte-Silver Bow (BSB) Planning Dept. Mgr.
	Julia Crain	BSB Health Dept. Mgr. Residential Metals Abatement (RMAP) and former BRES
	Eric Hassler	

EPA Objectives:

- RA will have met key leaders and representatives of the Butte Community
- Butte community members will have had an opportunity to meet the RA, introduce themselves, raise concerns, and ask questions
- EPA will identify key community concerns and public engagement preferences

Community Meeting Agenda:

1:15 – 1:30 (Prior to RA arrival)	• Set productive tone, review agenda	Northey, Robert
1:30 – 1:35 (5 minutes)	• Welcome from Butte • Initial greetings and handshakes	Northey Robert
1:35 – 1:40 (3 – 5 minutes)	• Intro to meeting, intent/goals • intro EPA team	Andrew Doug & Suzanne
1:40 – 2:10 (30 minutes)	• Roundtable introductions • concerns	Butte community participants
2:10 – 2:25 (15 minutes)	• Q&A	All
2:25 – 2:30 (5 minutes)	• RA final remarks • EPA follow up	Doug Robert
2:30 – 3:30 (30 minutes)	• Debrief and next steps	Northey, Robert

Capstone Talking Points:

- R8 visit to Montana and Butte is sign of EPA's recognition of the priority issues here.
- EPA is committed to move faster and smarter to implement Superfund.
- Before any final decisions are made with the SBCBA site, EPA will first reach out to the public and collect and consider all public comments and feedback. (BPSOU and WWS)
- EPA can be more informed, move faster, and implement better remedies when we have community involvement.

- What are your main concerns/recommendations? What do you feel is working/not working about the remedy? How do you see EPA cooperation with the public? Have you seen any improvements?

Unrelated Site/Deliberative Process - Exemption 5

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West Side Soils (WSS) Operable Unit

Why has it taken so long to address WSS?

- WSS includes the mining impacted areas in and around the City of Butte that are not included in the BPSOU
- The area of WSS has been sampled in the past as part of the initial effort to characterize environmental contamination as a result of historic mining activities. Initial data did not indicate any immediate human health concerns in this area.
- EPA chose to prioritize areas ("priority soils") to implement a remedy in light of data that indicated areas where the greatest potential threats to human health existed.

Ex. 5 - Deliberative Process

Who will be the EPA project manager?

- Nikia Greene, EPA RPM in Helena is being considered as the EPA project manager for the West Side Soils Operable Unit (WSS). An RPM for WSS will be established before the Remedial Investigation (RI) begins.

Unrelated Site?Deliberative Process - Exemption 5

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More About Butte

The Silver Bow Creek Butte Area Superfund (SBCBA) site is located in the upper Clark Fork River Basin, Silver Bow and Deer Lodge Counties, Montana. The site includes approximately 26 miles of stream and streamside habitat, the urban centers of Butte and Walkerville, rural areas outside of Butte, the Berkeley Pit and the underground mine workings of the historic Butte Mining District, the former Rocker Timber Framing and Treatment Plant and the treatment/settling lagoons at the Warm Springs Ponds.

The site is currently divided into seven active operable units (OU). EPA has completed four five-year reviews of the site's remedy to ensure that the remedies put in place for each OU are protective of public health and the environment and function as intended by site decision documents.

- **Streamside Tailings OU1** – includes the 26-mile, mine-waste impacted Silver Bow Creek floodplain. Continued protectiveness of the OU1 remedy requires completing implementation of the selected remedy; filling in data gaps; implementing enforceable institutional controls; and updating and implementing the monitoring and maintenance plan.
- **Butte Mine Flooding OU3** – includes contaminated groundwater in the flooded underground mine workings below the city of Butte along with contaminated water in the Berkeley Pit. The West Camp/Travona Mine OU6 was previously part of this OU, but treatment of the West Camp groundwater was transferred to OU8 with the BPSOU ROD. Continued protectiveness of the OU3 remedy requires resolving treated effluent water quality issues before discharge to Silver Bow Creek becomes necessary.
- **Rocker Timber Framing and Treating OU7** – includes soils and groundwater contaminated with arsenic from a former timber treating facility. Continued protectiveness of the OU7 remedy requires ongoing monitoring; continued implementation of institutional controls, site access controls, updated conceptual site model; and operation and maintenance activities.
- **Warm Springs Ponds (WSP) Active Area OU4** – includes the portion of the 2,600-acre WSP that actively treat the entire flow of Silver Bow Creek prior to its confluence with Warm Springs Creek, forming the start of the Clark Fork River. It also includes the reconstructed Mill-Willow Bypass. Continued protectiveness of the OU4 remedy requires remedy implementation progress at other upstream OUs.
- **Butte Priority Soils OU8 (BPSOU)** – includes impacted soils, mine wastes, and contaminated attic dust located within portions of the city of Butte, along with mining-impacted alluvial groundwater and surface water associated with the historic and current Silver Bow Creek floodplain within the city of Butte. To ensure protectiveness, remedy implementation must be completed and municipal storm water contributions to Silver

Bow Creek must be addressed.

- **Warm Springs Ponds Inactive Area OU12** – includes the portion of the 2,600-acre WSP that are not part of the active treatment of Silver Bow Creek water. Continued protectiveness of the OU12 remedy requires remedy implementation progress at other upstream OUs.
- **West Side Soils OU13** – includes the mining-impacted areas in and around the city of Butte that are not included in the BPSOU or the permitted active mining area. This OU was not included in the last five-year review.

Contaminants of Concern in Butte

Contaminant	Solid Media	Ground Water	Surface Water
Aluminum			X
Arsenic	X	X	X
Cadmium		X	X
Copper		X	X
Iron			X
Lead	X	X	X
Mercury	X	X	X
Silver			X
Zinc		X	X

A variety of actions have taken place to address the contamination in Butte, including:

- Assessments of risk have been conducted to quantify actual and potential human health risks in tailings, waste rock, yard soils, indoor dust, attic dust, mercury vapor, surface water, and ground water
- Removal of tailings, contaminated soils, and sediment, and placement of these materials in a managed repository, especially along streams, and the establishment of vegetation in the areas affected by removals
- Construction of water treatment plants and treatment of contaminated water
- Capping of contaminated waste dumps and railroad beds
- Revegetation and the establishment of vegetation that meets performance standards in the Butte Reclamation Evaluation System (BRES),
- Installation of stormwater controls
- Capture and treatment of groundwater
- Alternative water supply systems and controlled groundwater areas for the community
- Institutional controls and a residential metals abatement program (RMAP) that provides a comprehensive cleanup of residential yards and attics
- Extensive operation and maintenance
- Education and engagement

The final SBCBA remedies are not complete, and further work to implement the remedies is ongoing. Only one operable unit (OU), Mine Flooding, has a completed treatment plant, and further actions are required under the Mine Flooding consent decree to upgrade and improve that plant. The Streamside Tailings OU remedy is nearly complete. The other OUs still have work to implement under the Records of Decision (RODs).

The protectiveness statements in the FYR are based on data that show that the many of the risk pathways associated with the contamination in Butte have been or will be controlled. Other pathways will be addressed with future actions. The data addressing human health risks in Butte and Walkerville can be found in numerous reports such as the 2015 Construction Completion Report Butte-Silver Bow Health Department Residential Metals Program report, dated February 2016 and the Butte Priority Soils Operable Unit (BPSOU) Public Health Study Phase 1, dated July 2, 2014.

More About Anaconda

The site consists of multiple areas, referred to by EPA as operable units (OUs).

- OU15, Mill Creek: The remedy selected in 1987, included permanently relocating all Mill Creek residents,

removing demolition debris and contaminated soils for later disposal, regrading and replanting areas disturbed by relocation/demolition activities, monitoring and maintaining the vegetation, and controlling access to the area. Construction of the remedy finished in late 1988. Operation and maintenance activities are ongoing.

- OU11, Flue Dust: The remedy selected in 1991, included stabilization of about 316,500 cubic yards of flue dust, placement of the treated materials in an engineered repository, long-term maintenance and monitoring, and institutional controls. The remedy required that the repository include a liner, leak detection and collection system, groundwater monitoring wells, and a cap. Construction of the remedy finished in September 1996. Operation and maintenance activities are ongoing.
- OU7, Old Works/East Anaconda Development Area: The remedy selected in 1994, included placement of engineered covers over waste, treatment of soils, surface water controls, upgrades or repairs to streambank levees, replacement or repairs to bridges, institutional controls, long-term monitoring and preservation of historic features. OU7 consists of six subareas. Construction is complete at five of the six areas. Construction at the sixth area, the Industrial Area, is nearly complete.
- OU16, Community Soils: The remedy for residential soils, selected in 1996 and modified in 2013, included removal of arsenic-contaminated soils and replacement with clean soil. This remedy also called for the cleanup of future residential soils through institutional controls. The remedy for commercial/industrial areas and the active railroad area included placement of engineered covers. Construction of the remedy was finished in 2010. Operation and maintenance activities are ongoing.
- The 2013 modification to the Community Soils remedy, included cleanup of lead-contaminated residential soil, expanding the institutional controls program and development of an interior dust abatement program. Implementation of this remedy began in 2015 and is ongoing.
- OU4, Anaconda Regional Water, Waste and Soil: The remedy selected in 1998 and modified in 2011 included consolidation of miscellaneous waste materials, placement of engineered covers over waste management areas, treatment of contaminated soils, storm water controls and institutional controls, including the monitoring and regulation of domestic wells in groundwater areas. A Technical Impracticality Waiver for arsenic in groundwater has been applied to large areas of the site. The OU consists of 15 subareas. Remedial action is ongoing at most of the subareas. Over 10,000 acres have been remediated to date. Construction is expected to be completed over the next 10 years.

Cleanup has been ongoing since late 1980's; over $350 million has been spent on cleanup to date.

- Nearly 1000 residential and commercial properties have been cleaned up to date, with another 1000 to be completed in the next three+ years.
- All domestic wells and/or water supplies have either been tested and/or remediated (treatment units) within the site. Wells will be continued to be sampled/treated.
- Over 3 million cubic yards of waste have been removed from the community and consolidated onto AR property.
- Over 5000 acers of the former smelter facility and disposal areas have been capped and revegetated.
- Nearly 1000 acers of new wetlands have been constructed and another 5000 acers protected.
- Over 12,000 acers of adjacent contaminated soils have been reclaimed and now support wildlife and provide for grazing lands.
- 140,000 feet of stormwater controls have been placed to reduce contaminated sediments from impacting streams, and
- 30,000 feet of stream have been restored providing for a high-quality fishery.
- EPA recently released an ESD for the community soils remedy and a proposed plan for the Anaconda Regional Water, Waste and Soils (ARWWS) 2017. EPA is considering public comments before making a final decision.
- Cleanup work was coordinated with local development partners for current reuse:
  Jack Nicklaus Golf Course; Regional Prison Facility; Peak Power Generating Plant; Campus complex; residential and commercial developments; Reuse of slag materials as a commercial product. A processing facility is currently being constructed to turn slag into proppant and pig iron.

Recent/ongoing Community Involvement

- Website updates and posted monthly progress reports, fact sheets, and technical documents related to the site
- Meetings with community groups e.g., Citizens' Technical Environmental Committee (CTEC); Restore our Creek; Citizen's for Labor and Environmental Justice.
- TAG grant to CTEC and involving them in technical and AOC technical meetings and groundwater discussions.
- Congressional updates to Senator Daines and Tester's office during regular monthly briefings.
- Interviews: 1) local news media 2) with community members and groups
- Community engagement by EPA senior leadership: 2 RA visits in June and Nov 2016; 2017 R8 OCPI Director visit
- Interagency technical committee meetings with scientific stakeholders, and PRPs to update waterfowl protection measures
- Environmental Justice outreach plan for Butte; developed and distributed "Be Contaminant Smart" brochure
- 2016 Five Year Review; developed and distributed final report, summary fact sheet, and Q&A; held multiple public meeting and public availability sessions.
- Public availability sessions to schools and community groups e.g., MT Tech, Butte High School, and Clark Fork Watershed Education Program, Butte Kiwanis, etc.
- Public showings of "Worth the Wait" video documentary of the Butte Area Superfund cleanup

Timeline: RA, DRA MT Visit

Date/time	Event	Location	resources
Sun. 10/29 pm	RA, DRA arrive Helena		
Mon. 10/30 8:30 9:00 – 10:00 10:00 – COB 12:30 – 1:30 2:30 – 3:30	RA, DRA visit MT - Helena Meet with Joe and Carson Meet MT office employees RA DRA schedule RA, DRA Gov Bullock; RA, DRA meeting with AG Fox;	 Joe's office MT Office Wardell room On & off site 1301 East 6th Avenue 215 N. Sanders Street	MT office room & connection Doughnuts Q's & TPs about potential issues MT DEQ, BOG, AG
Tue. 10/31 8:30 – 10:30 10:30 – TBD 6:00	RA, DRA in MT - Helena O&G meeting MTBOG; DEQ RA, DRA, JV meet with DEQ RA, DRA dinner and Halloween options	 MT Office Wardell room DEQ State Office TBD	Q's & TPs about potential issues TBD
Wed. 11/01 8:00 – 9:30 9:30 – 11:30 11:30 – 12:30	RA, DRA travel to Butte RA, DRA, JV, NG touch base with DEQ and travel to Butte RA, DRA, JV, NG + DEQ Director Tom Livers, Jenny Chambers Lunch RA, DRA, AM, JV, NG	 DEQ State Office 8:00 depart at 8:15 Taco Del Sol?	Vehicle
12:30 – 1:00	RA, DRA, AM meet with MT Standard Newspaper – Editor David McCumber; Susan Dunlap	25 W. Granite St, Butte	Q's & TPs about potential issues
1:00 – 1:30	RA, DRA, AM, JV, NK quick tour – Berkeley Pit; USBC	Berkeley Pit viewing John Wardell Memorial Bridge	Photo op for social media TP, Social media messages TBD Rendezvous with NBC TV crew?
1:30 – 2:30	RA, DRA, JV, RM meet with Butte community members RA, DRA 2:30 departure	Butte Chamber of Commerce visitor's center, 1000 George St., Butte MT	Agenda, sign in sheet, flip chart Q&TPs about potential issues Water, juice, coffee, cups, snack
2:30 – 3:00	ROCC, RM, JV, NG finish meeting with ROCC		ID follow up tasks
3:00	JV, NG, RM depart home		Silver Explorer reserved